

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 14-30142-MJR
)	
JOSEPH E. SUGGS,)	
)	
Defendant.)	

GOVERNMENT'S MOTION TO DISCLOSE GRAND JURY MATERIAL

The United States of America, by and through its attorneys, Stephen R. Wigginton, United States Attorney for the Southern District of Illinois, and Angela Scott, Assistant United States Attorney, and hereby respectfully requests authority to disclose grand jury material to the defense, and in support thereof, states as follows:

1. Defendant Joseph Suggs was indicted on July 23, 2014, for Production of Child Pornography. He has a current trial date of August 31, 2015. The Government has previously produced all of the discovery materials in its possession, including Jencks Act statements, to the defense, with the exception of the Grand Jury transcript.
2. There is grand jury testimony of a potential government witness should this case proceed to trial, United States Secret Service Task Force Officer ("TFO") William Barlock, which is protected by Federal Rule of Criminal Procedure 6. This material constitutes Jencks Act material because the Government intends to call TFO Barlock as a witness at trial or sentencing or both, and, although the Government is not required to turn over Jencks Act materials until after the witness testifies, in the interests of preventing any delay in any potential pretrial matters, the Government is prepared to turn over these materials once the Court rules on its

motion.

3. Pursuant to Federal Rule of Criminal Procedure 6(e)((3)(E)(i), the Court may authorize disclosure of a grand jury matter preliminarily to or in connection with a judicial proceeding.

WHEREFORE, the United States respectfully requests that it be given authority, pursuant to Federal Rule of Criminal Procedure 6(e)(3)(E)(i), to disclose these materials to the defense.

Respectfully submitted,

STEPHEN R. WIGGINTON
United States Attorney

/s/ *Angela Scott*
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CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2015, I electronically filed the **Government's Motion to Disclose Grand Jury Material** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Mike Ghidina, Esq.

Respectfully submitted,

STEPHEN R. WIGGINTON
United States Attorney

/s/ *Angela Scott*
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